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January 7, 2021

Mr. Ben Steffen Executive Director Maryland Health Care Commission 4160 Patterson Avenue Baltimore, Maryland 21215

Re: Adventist HealthCare White Oak Medical Center: Alternate Care Site in Takoma Park: Docket Number EM-H20-15-036: Request for Supplemental Emergency Certificate of Need

Dear Mr. Steffen:

I am writing on behalf of Adventist HealthCare, Inc. d/b/a Adventist HealthCare White Oak Medical Center ("WOMC"), pursuant to the Maryland Health Care Commission ("Commission") regulations at COMAR 10.24.01.20, to request a supplemental emergency certificate of need ("ECON"), to incorporate and expand on the May 20, 2020 ECON EM-H20-15-036 issued to WOMC (the "May 20, 2020 ECON"). This request is further prompted by the proactive steps initiated by Governor Hogan, Secretary Neal, the Commission and others to respond to COVID 19, pursuant to the state of emergency and catastrophic health emergency.

The May 20, 2020 ECON stated:

This Emergency Certificate of Need authorizes Adventist HealthCare, Inc. d/b/a Adventist Health Care White Oak Medical Center (White Oak) to establish additional inpatient bed capacity consisting of 200 medical/surgical/gynecological/addictions (MSGA) beds as an Alternate Care Site in a temporary remote location on the first through fifth floors and the lower level 1 floor of the former Washington Adventist Hospital, 700 Avenue, Takoma Park (Montgomery County) (the Site).

In this request for a supplemental ECON, WOMC wishes to expand the approval to include additional 16 intensive care unit beds to be located in the ACS in Takoma Park.

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The Commission's regulation limits an ECON to a capital budget that does not exceed the Commission's statutory Hospital capital threshold under Health—General Article, Section 19-120(a)(4), otherwise triggering a certificate of need requirement. WOMC represents that the total capital cost will be less than \$500,000.00.

We understand, based on guidance you have issued on the Commission's behalf that the requirement under COMAR 10.24.01.20C for the WOMC to file a certificate of need application is suspended until at least thirty (30) days after the declared state of emergency of March 5, 2020 (as extended) is terminated and that any ECON does not expire until thirty (30) days after the declared state of emergency of is terminated or 165 days after its issuance, whichever is later.

We request issuance of this ECON approval to enable WOMC to put these 16 intensive care unit acute hospital beds into service as soon as possible.

Sincerely,

Howard L. Sollins

cc: Dennis R. Schrader, Acting Secretary, Maryland Department of Health Katie Wunderlich, Executive Director, Maryland Health Services Cost Review Commission

Tricia Nay, M.D. Director, Office of Health Care Quality

Renee Webster, Assistant Director for Hospitals, Laboratories and Patient Safety, Office of Health Care Quality

Paul Parker, Director, Center for Health Care Facilities Planning & Development

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Anthony Stahl, President, Adventist HealthCare White Oak Medical Center Andrew Nicklas, Esq., Adventist Health Care